

REPLY TO MONTCLAIR OFFICE

June 9, 2018

Filed via ECF

Hon. Kimba M. Wood, Senior Judge
Daniel Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Juxhin Uli*, 17cr00641(KMW)

Dear Judge Wood:

This letter-motion is respectfully submitted as a joint request by the parties to set a new date for a status conference in this matter. We are presently scheduled to appear before Your Honor on June 13 at 10:30am. We respectfully request that Your Honor set a new date and time approximately 30-45 days from that date. If Your Honor grants this request, the parties will consult with each other and the Court's Deputy Clerk to settle on a date and time that is consistent with Your Honor's schedule and counsels' prior commitments.

The parties have been engaged in active plea negotiations. At present, a proposed plea offer is undergoing internal review in the Office of the United States Attorney. The process of a potential resolution of this case was somewhat delayed by the unavoidable circumstance that A.U.S.A. Skinner was engaged in a lengthy trial that was only recently completed.

The parties will consent to the exclusion of time from June 13 to any new date to be set for a status conference. The Court's time and attention to this matter are appreciated.

Respectfully yours,
/s/ David A. Ruhnke
David A. Ruhnke
Counsel to defendant

Cc: (via ECF) Drew Skinner, A.U.S.A